

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

METROPOLITAN TRANSPORTATION
AUTHORITY, et al.,

Plaintiffs,

NEW YORK CITY DEPARTMENT OF
TRANSPORTATION, et al.,

Intervenor-Plaintiffs,

v.

SEAN DUFFY, in his official capacity as
Secretary of the United States Department of
Transportation, et al.,

Defendants.

CIVIL ACTION NO. 1:25-cv-01413-LJL

**DECLARATION OF DEBORAH
BALDWIN IN SUPPORT OF
MOTION FOR PARTIAL SUMMARY
JUDGMENT**

1. I, Deborah Baldwin, set forth that I am over the age of 18 years and am competent to attest to the facts contained in this Declaration.

2. I live in Murray Hill, in Manhattan's Central Business District. I have lived in my current home on East 36th Street since 1999. I am retired.

3. I rely on public transportation to get around New York City. I mainly use buses, although I also use the subway system. I especially depend on buses to get me to my regular medical appointments on the Upper East Side. The buses I ride most frequently are on First and Third Avenues, and occasionally on Madison Avenue.

4. While traffic has been an issue in Murray Hill for decades, in recent years congestion became significantly worse. This heavy traffic significantly impaired my ability to rely on timely bus service, as congestion slowed the buses to a crawl.

5. Beyond slowing down the buses I rely on, traffic congestion contributed to many significant issues that undermined my quality of life and that of my neighbors.

6. Walking in Murray Hill is more dangerous and less pleasant when you are surrounded by a sea of cars. Crossing streets is hazardous due to the rampant blocking of boxes on Third Avenue in the 30s. Drivers settle into the intersection after losing the light and try to ignore frustrated drivers attempting to cross with the light. As part of this no-win syndrome drivers also straddle the crosswalks. I find myself threading my way between bumpers and waving my arms in hopes I won't get crushed.

7. Cars that are caught in traffic also honk frequently, and the frequent and unpredictable sharp sound of honking is disruptive and unhealthy. Jarring sounds like honking cause anxiety and reduce concentration.

8. Finally, the more that cars sit idling in heavy traffic, the more air pollution is emitted near my home. It sickens me to know how much air pollution I have inhaled over the years on 36th Street. Every time I run a dust cloth across a windowsill it comes up black.

9. I have noticed that since Congestion Pricing began, traffic has improved in and around my neighborhood. Murray Hill still has traffic issues, but honking has gone down.

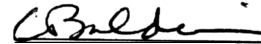
10. At times of day when I was used to seeing many more cars outside my window, I have noticed that instead traffic can be sparser than it used to be.

11. I look forward to the continued reduction of traffic congestion as the tolling program continues to change driver behavior. I even have the hope now of being able to open my windows more over the summer without the fear of air pollution.

12. I support congestion pricing because I want to feel safe walking in my neighborhood, experience less noise, breathe less dangerous air pollution, and be able to count on timely arrival at my medical appointments.

I declare under penalty of perjury and under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct.

Executed on June 27, 2025

A handwritten signature in black ink, appearing to read 'DBaldwin', is written over a horizontal line.

Deborah Baldwin